



United States Attorney
Eastern District of New York

AB:MT:RN:sw
F.#2009R00195
Disc. 16

271 Cadman Plaza East
Brooklyn, New York 11201

May 25, 2011

Via ECF and Federal Express

All Defense Counsel

Re: United States v. James Bombino, et al.
Criminal Docket No. 10-147 (S-1) (SLT)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following supplemental discovery with respect to the above-captioned case. The government hereby reiterates its request for reciprocal discovery.

STATEMENTS OF THE DEFENDANTS

Pursuant to the stipulation signed by the parties, attached to this letter are draft transcripts of: (1) portions of conversations recorded by a cooperating witness; and (2) draft transcripts of conversations recorded pursuant to a court-ordered wiretap of telephone number (732) 921-3219.

1. Consensual Recording Transcripts

The recordings corresponding to Discovery Exhibits 50 through 58 are contained in Discovery Exhibit 46, provided on April 22, 2011.

DX #	Description	Bates Range
50	Draft excerpt transcript of conversation dated 12/4/06	29110-29112
51	Draft excerpt transcript of conversation dated 1/11/07	29113-29118
52	Draft excerpt transcript of conversation dated 1/16/07 (Clip 1)	29119-29120
53	Draft excerpt transcript of conversation dated 1/16/07 (Clip 2)	29121-29135

DX #	Description	Bates Range
54	Draft excerpt transcript of conversation dated 1/16/07 (Clip 3)	29136-29139
55	Draft excerpt transcript of conversation dated 1/16/07 (Clip 4)	29140-29142
56	Draft excerpt transcript of conversation dated 1/16/07 (Clip 5)	29143-29146
57	Draft excerpt transcript of conversation dated 1/16/07 (Clip 6)	29147-29151
58	Draft excerpt transcript of conversation dated 1/16/07 (Clip 7)	29152-29154

2. Title III Recording Transcripts

The recordings corresponding to Discovery Exhibits 59 and 60 are contained in Discovery Exhibit 8, provided on March 23, 2010.

DX #	Description	Bates Range
59	Draft excerpt transcript of call 5184, dated 12/9/04	29155-29157
60	Draft excerpt transcript of call 5186, dated 12/9/04	29158-29162

Please contact me if you have any questions or additional requests.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Samantha Ward
Paralegal Specialist
(718) 254-6142

cc: Clerk of the Court (SLT) (by ECF *without* attachments)